



*United States Attorney  
Southern District of New York*

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**U.S. ACCUSES 3, INCLUDING WASHINGTON, DC, DMV EMPLOYEE,  
IN SCHEME TO OBTAIN LICENSES FOR MORE THAN 900 ALIENS**

JAMES B. COMEY, the United States Attorney for the Southern District of New York, announced that RAFET OZOGLU, a/k/a "Mehmet Ak," MUSTAFA OZSUSAMLAR, a/k/a "Mustafa Ozcan," a/k/a "Missta Oscane," and GWENDOLYNN DEAN, were charged today in Manhattan federal court in a Superseding Indictment of conspiracy to transport aliens from the New York area to Washington, D.C., in order to fraudulently obtain Washington, D.C., driver's licenses for the aliens by bribing DEAN, an employee of the Washington, D.C., Department of Motor Vehicles.

The new Indictment raises from about 100 to more than 900 the number of aliens involved in the license scheme.

According to the Indictment, throughout the two-and-a-half year course of the conspiracy, the defendants fraudulently obtained more than 900 Washington, D.C., driver's licenses by bribing DEAN. Many of those obtaining the Washington, D.C.,

driver's licenses were illegal aliens and approximately 75 of the individuals later exchanged their fraudulently obtained Washington, D.C., driver's licenses for New York driver's licenses.

According to the Indictment, and Criminal Complaints previously filed in the case, DEAN was a window clerk with the Washington, D.C., Department of Motor Vehicles ("DC DMV"). From January 2000 through June 2002, OZOGLU and OZSUSAMLAR allegedly solicited co-conspirators who wished to fraudulently obtain driver's licenses (the "Clients") and transported those Clients from the New York area to Washington, D.C. ("DC"), usually driving the Clients in passenger vans. Most of the Clients were of Middle Eastern, South Asian or Russian descent and many were illegal aliens.

According to the Indictment, once in DC, OZOGLU, OZSUSAMLAR, and/or their co-conspirators, filled out DC DMV driver's license applications for the Clients, using fictitious DC addresses and then accompanied the Clients to a DC DMV office and to the window of DEAN. At the window, DEAN allegedly processed the Clients' applications, despite the absence of proof of name and date of birth, social security number, and residence, in exchange for cash payments from OZOGLU, OZSUSAMLAR, and/or their co-conspirators. After each Client obtained a valid DC driver's license, OZOGLU, OZSUSAMLAR, and/or their co-conspirators drove drive the Clients back to the New York area,

it was charged.

According to the Indictment, the Clients each paid OZOGLU, OZSUSAMLAR, and/or their co-conspirators approximately \$1,500 for this service. Throughout the course of the purported conspiracy, OZOGLU, OZSUSAMLAR and/or their co-conspirators, fraudulently obtained more than 900 DC driver's licenses in the manner described above, and approximately 75 of the Clients exchanged their fraudulently obtained DC driver's licenses for New York driver's licenses under New York's reciprocity program, which issues New York driver's licenses to New York residents with driver's licenses from certain other states, including DC.

If convicted, OZOGLU and OZSUSAMLAR each face maximum sentences of 5 years in jail for conspiracy to bribe a public official; 15 years for bribery of a public official; 15 years for conspiracy to commit identification document fraud; 15 years for identification document fraud; 10 years for conspiracy to transport illegal aliens; and 5 years for transportation of illegal aliens. In addition each count carries a maximum fine of \$250,000 or twice the gross gain or loss resulting from the crime.

If convicted, DEAN faces a maximum sentence of 15 years in jail and a \$250,000 fine or twice the gross gain or loss resulting from the crime on each count of conspiracy to commit

identification document fraud and identification document fraud.

Mr. COMEY praised the efforts of the Federal Bureau of Investigation in investigating this case.

Mr. COMEY stated: "This Indictment is part of this Office's continuing efforts to vigorously prosecute false identification document rings and the corrupt public officials that allow the rings to flourish. Such crimes are potential threats to our national security, as well as common precursors to other criminal activity such as credit card and identification document fraud."

Mr. COMEY said the investigation is continuing.

The defendants are scheduled to be arraigned on Tuesday, January 14, 2003, before United States District Judge KIMBA M. WOOD.

OZOGLU, 41, was a resident of Brooklyn, New York, until his arrest in June 2002 on these charges. OZSUSAMLAR, 58, was a resident of Manhattan until his arrest in December 2001 on other federal charges. DEAN, 48, is a resident of the District of Columbia.

Assistant United States Attorney ALEXANDER H. SOUTHWELL is in charge of the prosecution.

The charges contained in the Indictment are merely accusations, and the defendants are presumed innocent unless and until proven guilty.

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